

EXHIBIT

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN) ECF Case
This document relates to: <i>Thomas Burnett, Sr., et al. v. The Islamic Republic of Iran, et al.</i>	15-cv-9903 (GBD) (SN) ECF Case

DECLARATION OF EDGAR FELIX

I, Edgar Felix, pursuant to 28 U.S.C. § 1746, do hereby declare under penalty of perjury as follows:

1. I am more than 18 years of age and competent to testify in court to the matters stated below. The statements made in this Declaration are based on my personal knowledge unless otherwise indicated.

2. I was a citizen of the United States on September 11, 2001, and remain so today. Attached as Exhibit A to this Declaration is a true and correct copy of my birth certificate.

3. On September 11, 2001, I was present at the Millennium Hotel in New York City when the terrorist attacks of the World Trade Center occurred.

4. On the morning of September 11, 2001, I was working at my job as a houseman for the Housekeeping/Banquet department at the Millennium Hotel across the street from Tower One of the World Trade Center. I had been working for the Millennium Hotel since 1999, and my coworkers and I were getting ready to start the day's work. I was one level down from the lobby which is the where the locker room, cafeteria, HR and security desk are, when I heard a large boom and a shake of the ground. After a couple of minutes, I started hearing screams and everyone at

the hotel was going outside to see what had happened and I went outside too. I began to see fire ripping through the tower across the street. At that time, I didn't actually know what had happened, but I knew I didn't want to go back inside the hotel either. I was still outside when after about 15-20 minutes, the second airplane hit and that's when I realized we were under attack and everyone, including me, moved further away from the hotel. There was a lot of smoke and fire and debris and one of the buildings started to come down and everyone started running. As we were running away, the smoke consumed us. I took a bad fall on the sidewalk and I couldn't see where I was going. One of my managers picked me up and we kept on running. I walked home to 42nd Street from the World Trade Center. I was home for about 2-3 days when one of my managers called me to ask if I would come to the hotel to help in the clean-up efforts picking up debris. My knee was very swollen at the time from the fall I had taken, but I wanted to go help. I was at the hotel helping with the clean-up for four (4) months. In the first week after the attack, I did go to the hospital to have my knee checked out. My knee would lock up on me, but I fought through the pain as I wanted to help in the clean-up efforts. My first knee surgery was in 2002 and I worked at the hotel for another 8 years after the hotel was repaired and rebuilt. I stopped working at the hotel in 2010 due to my progressive knee pain. To date, I have had four knee surgeries: 2002, 2011, 2014 and 2016. Since 2010, I have been doing odd jobs to make money and I have not yet started collecting any disability. I lost eight childhood friends in the attacks on 9/11, and although I saw people jumping out of the towers, as well as the loss of my friends, I made a choice to stop recalling those memories. To date, I have a hard time walking on stairs and cannot lift anything heavy or do sports or go the gym due to my left knee. I have developed COPD due to the inhalation of the dust, smoke and debris and my quality of life has changed dramatically.

5. I was in New York City at Ground Zero when the planes hit the towers and I received physical injuries in the escape and collapse. In the course of the attack and my escape, I witnessed

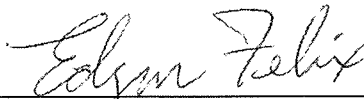
atrocities beyond the imagination of the average citizen. The situation could only be compared to a war zone. I was going about my everyday life in a peaceful manner when we were brutally attacked by terrorists and my life was altered forever.

6. As a result of these terrorist attacks, I suffered the following specific injuries on September 11, 2001: damage to my left knee (derangement of meniscus) while running away from the towers, as well as having lung damage from inhalation of the smoke, dust and debris.

7. I sought medical attention for my injuries to my left knee and have had four surgeries to my knee at Mt. Sinai Hospital in New York City. I take medications and undergo physical therapy for my left knee to help with the arthritis. I have also developed gastric reflux disease and use a CPAP machine for the lung damage and sleep apnea. At this time, I am contemplating knee replacement surgery. Attached as Exhibit B to this Declaration is a true and correct copy of some of my medical records related to the treatment that I received following the September 11, 2001 terrorist attacks.

I declare UNDER PENALTY OF PERJURY that the foregoing is true and correct.

EXECUTED on this 24 day of December, 2019.



Signature of Declarant

**EXHIBITS
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UNDER SEAL
(ECF No.
5716)**